

**REMARKS / ARGUMENTS**

Claims 35-48 and 56-89 remain pending in this application. New claims 66-89 have been added.

**Priority**

Applicant appreciates the Examiner's acknowledgment of the claim for priority and safe receipt of the priority document.

**35 U.S.C. §112**

The Examiner objects to the Specification for allegedly not disclosing "a single physical input/output port which is coupled to the internet". It is pointed out to the Examiner that the claims recite "a physical input/output port to be coupled to the IP network". Several such physical input/output ports are shown in Figure 6. It is incorrect for the Examiner to insist that the claim language requires that only one such physical input/output port must be shown.

The Examiner objects to the specification for allegedly not disclosing how to assign two different port numbers to a single physical input/output port. Once again, the Examiner's attention is directed to the actual claim language. Claim 35, for example, states the following: "physical input/output port being accessible by a block I/O request having a first port number via the IP network and a file I/O request having

a second port number via the IP network". Since the claims do not recite that two different port numbers are assigned to a single physical input/output port, the Examiner's objection is moot. The Examiner's attention is also directed, by way of example to paragraph [0160] of corresponding Publication No. 2002/0178143 in which the processing of input data packets according to a port number specified in the TCP packets is described.

With respect to the Examiner's objection to the difference between file-based I/O blocks and block-based I/O blocks, Applicants wish to point out that such difference is notoriously well known in the art. Nevertheless, the handling of block data and file data is clearly explained in paragraphs [0088] - [0100].

Finally, the Examiner comments that the Specification does not disclose how internet traffic is divided into two categories, i.e., block-based and file-based. Once again, applicants wish to point out that these two "categories", as defined by the Examiner, are notoriously well known in the art. In any case, the specification clearly discloses the differences between a storage area network (SAN) and a network attached storage (NAS) as it relates to these "categories". Therefore, it is submitted that the Examiner's rejection under this section should be withdrawn.

**35 U.S.C. §103**

Claims 35-48 and 56-59 stand rejected under 35 U.S.C. §103(a)) as being unpatentable over Barrera et al (U.S. Pat. No. 6,748,448) in view of White (U.S. Pat.

No. 6,002,669) and further in view of Han et al (U.S. Pat. No. 5,991,542). Claims 60-65 stand rejected under 35 U.S.C. §103(a)) as being unpatentable over Barrera et al, White and Han et al and further in view of Kazar et al (U.S. Pub. No.2002/0112022). These rejections are traversed as follows.

The Examiner agrees that the main reference, Barrera et al, does not handle two types of requests as claimed. It is submitted that the Examiner's reliance upon White for curing this deficiency is misplaced. White discloses a block transfer mode formed by binary files in which a plurality of files are transmitted. White does not disclose that two different types of data, i.e. block data and file data, are transferred. In addition, White does not disclose that the block I/O request and the file I/O request come from different computers as recited in claims 35, 42 and 56. White also does not disclose that the block I/O request is based on a SCSI standard as set forth in new independent claims 66, 73 and 80.

Furthermore, Han et al merely discloses that logical blocks store file data. Han et al do not disclose the different types of data stored in different regions as alleged by the Examiner. As such, it is submitted that the pending claims patentably define the present invention over the cited art.

#### **Request for Interview**

Applicants request that the Examiner conduct an interview with the undersigned prior to issuing a first Office Action. As such, Applicants request that

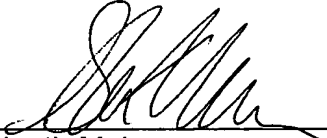
the Examiner contact the undersigned by telephone to arrange an appropriate date and time for the interview.

**Conclusion**

In view of the foregoing, Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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